



CONSUMER
HEALTHCARE
PRODUCTS
ASSOCIATION

Taking healthcare personally.

May 20, 2024

The Honorable Representative David Bennett
Chair, House Environment and Natural Resources Committee
Rhode Island Senate
82 Smith Street
Providence, RI 02903

Re: 7619 - Toxic Packaging Reduction Act (Oppose)

Dear Chair Haider:

On behalf of the Consumer Healthcare Products Association (CHPA), the Washington, D.C. based national trade organization representing the leading manufacturers of over-the-counter (OTC) medicines, dietary supplements, and consumer medical devices, I'm writing to express opposition to H 7619. This legislation prohibits the manufacture or distribution of packaging containing polyvinyl chloride (PVC). While we appreciate the environmental concerns motivating this legislation, H. 7619 fails to consider the critical role that PVC plays in the production of blister packaging for Food and Drug Administration (FDA) regulated medications and dietary supplements.

Blister Packaging and Consumer Safety

Blister packaging, also known as unit dose packaging, is widely used in healthcare and pharmaceutical packaging to ensure safe delivery of OTC medications and dietary supplements. This type of packaging has been recommended by the FDA to reduce accidental ingestion, misuse, and overuse of medications and other home self-care products.¹ To enhance product safety, blister packaging can be designed with tamper-evident features, ensuring product integrity and child-resistant blister packs help prevent unintended access and accidental ingestion by children.

Critical use of PVC in Consumer Healthcare Product Packaging

PVC used in blister packaging offers unique durability and flexibility, providing the necessary barrier against moisture, oxygen, and environmental factors that degrade the quality of medications. These characteristics are crucial to maintaining the integrity, efficacy, and shelf life of OTC drugs and healthcare products.

PVC is also cost-effective, contributing to the accessibility of OTC medications and healthcare products for consumers. PVC blister packs are lightweight, compact, and easy to carry, making them convenient for consumers to use on the go. The individual compartments in blister packaging allow for easy dosage tracking and help patients adhere to their medication regimens.

FDA-Regulated Consumer Healthcare Products Should be Exempt

¹ <https://www.fda.gov/news-events/press-announcements/statement-fda-commissioner-scott-gottlieb-md-newsteps-help-prevent-new-addiction-curb-abuse-and>

Given the aforementioned reasons, it is important to note that no state currently prohibits the use of PVC in FDA-regulated consumer healthcare products packaged in blister packaging. Implementing such a prohibition would set a concerning precedent that could lead to adverse health consequences for the residents of Rhode Island and hinder their access to essential consumer healthcare products.

To prevent these potential negative implications, we respectfully request that the following exemption language be added to part (e) on page 4, beginning on line 20:

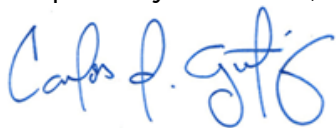
"This section does not apply to products regulated as a drug, medical device, or dietary supplement by the United States Food and Drug Administration under the Federal Food, Drug, and Cosmetic Act, 21 U.S.C. 321 et seq., or Sec. 3.2(E) of 21 U.S. Code of Federal Regulations Act"

Conclusion

PVC plays a vital role in the production of blister packaging for OTC medications and healthcare products. Its durability, versatility, compatibility with multiple formats including tamper-evident and child resistant packaging, cost-effectiveness, and ease of use make it an ideal choice for the healthcare industry. As the demand for safe and convenient packaging solutions grows, PVC blister packaging will continue to be a key component in ensuring the quality, safety, and accessibility of healthcare products.

Thank you for your consideration and feel free to contact me directly if I can provide additional perspective.

Respectfully submitted,



Carlos I. Gutierrez
Vice President, State & Local Government Affairs
Consumer Healthcare Products Association
cgutierrez@chpa.org | 202-429-3521

cc: House Environment and Natural Resources Committee